REMARKS

Applicant respectfully request further examination and reconsideration in view of the instant response. Claims 19-41 remain pending in the case. Claims 1-18 have been cancelled without prejudice. Claims 29-41 are new. No new matter has been added.

35 U.S.C. §102(b)

Claims 1-12 stand rejected under 35 U.S.C. §102(b) as being anticipated by United States Patent 5,260,783 by Dixit, hereinafter referred to as the "Dixit" reference. The rejection stands moot in light of the cancellation of Claims 1-12 and the addition of Claims 19-33. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 19-33 are not anticipated by Dixit.

Applicant respectfully directs the Examiner to independent Claim 19 which recites that an embodiment of the present invention is directed to (emphasis added):

> A method for encoding digital data comprising:
> accessing a digital video image;
> dividing said digital video image into a plurality of regions;
> numbering said plurality of regions wherein each of said plurality of regions is assigned a unique consecutive number;

selecting a first region based on said unique consecutive number wherein each of said plurality of regions is selected in the order of said consecutive number;

encoding all except said first region of said plurality of regions into encoded regions using interframe compression; and

transmitting said encoded regions and said first region as a video frame.

Independent Claim 27 recites a similar limitation. Claims 20-26 that depend from independent Claim 19, and Claims 28-33 that depend on independent Claim 27 provide further recitations of the features of the present invention.

Dixit and the claimed invention are very different. Applicant understands Dixit to teach a method for interframe transmission wherein a motion detector detects relative motion between the video frame to be encoded and the previous video frame. The motion detector provides a decision parameter K that is used to select a portion of the video frame to be interframe encoded. In contrast, embodiments of the claimed invention are directed towards a method of encoding a digital video image without the use of a decision parameter to select a portion of the video frame. Further, the claimed limitations of the present invention divide a digital image into a plurality of regions and assign a unique consecutive number to each region. Then a region is selected based upon the unique consecutive number and the remaining regions are encoded using interframe compression, as claimed. The remaining non-encoded region and the encoded regions are transmitted as a video frame. The regions are selected

based upon the consecutive number assigned to them, as claimed and not based upon a calculated decision parameter.

Applicant respectfully asserts that Dixit does not teach or suggest a method for digital video encoding that assigns a consecutive number to each of a plurality of regions of a video frame. Dixit also fails to teach or suggest selecting a particular region based upon the assigned consecutive number. In contrast, Dixit teaches a method of video compression that relies on the calculation of a decision parameter K to select the regions to be encoded (Dixit, Col. 2 lines 13-22). Dixit fails to teach or suggest encoding the regions in a consecutive order. Dixit actually teaches away from the claimed limitations of the invention by using a motion detector and a decision parameter to select the regions for encoding. By using a decision parameter, regions are selected based upon the motion of the video frame and not a fixed selection process.

Applicants respectfully assert that nowhere does Dixit teach, disclose or suggest the present invention as recited in independent Claims 19 and 27, and that these claims are thus in a condition for allowance. Therefore, Applicants respectfully submit that Dixit also does not teach or suggest the additional claimed features of the present invention as recited in Claims 20-26 which depend from independent Claim 19 and Claims 28-33 which depend from independent Claim 27. Therefore, Applicants respectfully submit that Claims 19-

33 overcome the rejection under 35 U.S.C. § 102(b), and are in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103(a)

Claims 13-18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dixit in view of Krishnamurthy, hereafter referred to as Krishnamurthy. The rejection stands moot in light of the cancellation of Claims 13-18 and the addition of Claims 34-41. Applicants have reviewed the cited reference and respectfully submit that the present invention as recited in Claims 34-41 is not anticipated nor rendered obvious by Dixit in view of Krishnamurthy.

Applicants respectfully direct the Examiner to independent Claim 34 which recites that an embodiment of the present invention is directed to (emphasis added):

> A computer readable medium comprising instructions that when executed implement a method for compressing digital video comprising:
>
> accessing a digital video image;
>
> dividing said digital video image into a plurality of regions;
>
> numbering said plurality of regions wherein each of said plurality of regions is assigned a unique consecutive number;
>
> selecting a first region based on said unique consecutive number wherein each of said plurality of regions is selected in the order of said consecutive number;
>
> encoding all except said first region of said plurality of regions into encoded regions using interframe compression; and
>
> transmitting said encoded regions and said first region as a video frame.

Claims 35-41 that depend from independent Claim 34 provide further recitations of the features of the present invention.

As described above, Dixit and the claimed invention are very different. Applicant understands Dixit to teach a method for interframe transmission wherein a motion detector detects relative motion between the video frame to be encoded and the previous video frame. The motion detector provides a decision parameter K that is used to select a portion of the video frame to be interframe encoded. In contrast, embodiments of the claimed invention are directed towards a method of encoding a digital video image without the use of a decision parameter to select a portion of the video frame. Further, the claimed limitations of the present invention divide a digital image into a plurality of regions and assign a unique consecutive number to each region. Then a region is selected based upon the unique consecutive number and the remaining regions are encoded using interframe compression, as claimed. The remaining non-encoded region and the encoded regions are transmitted as a video frame. The regions are selected based upon the consecutive number assigned to them, as claimed and not based upon a calculated decision parameter.

Applicant respectfully asserts that Dixit does not teach or suggest a method for digital video encoding that assigns a consecutive number to each of a plurality of regions of a video frame. Dixit also fails to teach or suggest selecting a particular region based upon the assigned consecutive number. In contrast,

Dixit teaches a method of video compression that relies on the calculation of a decision parameter K to select the regions to be encoded (Dixit, Col. 2 lines 13-22). Dixit taken in combination with Krishnamurthy fails to teach or suggest encoding the regions in a consecutive order. Dixit taken in combination with Krishnamurthy actually teaches away from the claimed limitations of the invention by using a motion detector and a decision parameter to select the regions for encoding. By using a decision parameter, regions are selected based upon the motion of the video frame and not a fixed selection process.

Applicants respectfully assert that nowhere does Dixit or Krishnamurthy teach, disclose or suggest the present invention as recited in independent Claim 34, and that this claim is thus in a condition for allowance. Therefore, Applicants respectfully submit that Dixit taken in combination with Krishnamurthy does not teach or suggest the additional claimed features of the present invention as recited in Claims 35-41 which depend from independent Claim 34. Therefore, Applicants respectfully submit that Claims 34-41 overcome the rejection under 35 U.S.C. § 102(b), and are in a condition for allowance as being dependent on an allowable base claim.

CONCLUSION

In light of the above listed remarks, reconsideration of the new Claims is requested. Based on the arguments presented above, it is respectfully submitted that Claims 19-41 overcome the rejections and objections of record and, therefore, allowance of Claims 19-41 is earnestly solicited.

Should the Examiner have a question regarding the instant response, the Applicants invite the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,

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